

Heller, Donald

From: Smith, Tammy <Tammy.Smith@Illinois.gov>
Sent: Friday, March 01, 2019 11:39 AM
To: Heller, Donald
Cc: Ramanauskas, Peter
Subject: RE: Bodycote Thermal Processing, Melrose Park

Donald,

Hello, I have (tried) to answer you questions below. Please feel free to give me a call to further discuss.

Tammy Smith

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From: Heller, Donald <heller.donald@epa.gov>
Sent: Friday, March 1, 2019 10:33 AM
To: Smith, Tammy <Tammy.Smith@Illinois.gov>
Cc: Ramanauskas, Peter <ramanauskas.peter@epa.gov>
Subject: [External] Bodycote Thermal Processing, Melrose Park

Hello Ms. Smith.

I'm with RCRA Corrective Action at Region 5, and I am working along with Peter Ramanauskas on the proposed TSCA PCB remedy for Bodycote Thermal Processing in Melrose Park. I understand that this is part of the overall IEPA VRP action for the Facility.

EPA will coordinate approval of the TSCA portion with IEPA.

A couple of days ago, we had a conference call with Bodycote and their consultants from Mabbett. They mentioned that you are the IEPA Project Manager.

We would like to know IEPA's requirements for:

- NFR thresholds for LNAPL recovery and allowable dissolved PCB concentration in groundwater.
LNAPL recovery is evaluated on site by site basis, but a general rule is 1/8" or less seepage and transmissivity of 0.8 ft²/ft or less.

The Class 1 standard for PCBs is 0.0005 mg/L and Class II is 0.0025 mg/L. Amounts higher than this are allowed to remain thru limited exposure demonstration. That is done through well survey and modeling to predict the potential extent of PCB migration. As long the migration distance is not within a setback zone of a well and there is a groundwater use restriction, we allow contamination in excess of those standards.

- Financial assurance for monitoring, O&M and maintaining engineered controls.

NFRs never require O&M for some kind of active treatment system or monitoring of media, or financial assurances.

Engineered barrier maintenance is required as part of the NFR and we do inspections of the barriers every 5 years. As you can imagine, it is hard to keep up with that demand as our project numbers grow and our staff is limited. If there is an unfavorable inspection, we give them notice to fix or NFR will be revoked. We have revoked a few NFRs due to this.

- If 10 feet BGS is an acceptable depth for assessing potential worker exposure risk for excavations.

We don't really restrict this exposure route per se. The full extent of contamination is determined then we assess the exposure routes, if there are exceedances of CW objectives at 11' BGS (or more), they have to address it with a Health and Safety requirement. The NFR is quite general, it just states if there is any intrusive work at the site there must be a Health and Safety plan, however we can make it depth specific.

- What IEPA will want included in the deed restrictions. (survey plat, health & safety plan, soil management plan, maintain building slab, etc.?)

The usual things are property use (Industrial/commercial), groundwater use, barriers and maintenance, construction worker cautions, slab-on-grade building requirements, or building control technology (BCT) such as a sub-slab depressurization system. Right now, Bodycote is considering a minimum building size requirement as a means to address the indoor inhalation exposure route, as opposed to a BCT. They are doing this by using the J&E equations adjusting for building size. No approvals yet. I have warned them that if they do this it will require any building from this point forward to maintain the size.

- IEPA's thoughts on Bodycote's proposal to leave high-concentration (~ 1 % PCB) in DNAPL found at 36 feet BGS, if it's proven to be immobile.

This is why we need you 😊 Again, site specific determination for evidence of immobility. Bodycote certainly has the years-worth of data to try and make this argument. We do consider it for the DNAPL but would have to have your approval for PCBs. There would be no long term monitoring required with an NFR. Not the easiest decision to make, but if can prove it and there is no risk of exposure, we do make those calls.

Please email or call me with your thoughts.

Thanks!

Don

Donald A. Heller, Corrective Action Project Manager
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